

**To:** Smith, Claudia[Smith.Claudia@epa.gov]; Nizich, Greg[Nizich.Greg@epa.gov]  
**From:** Razzazian, Christopher  
**Sent:** Tue 12/29/2015 5:10:14 PM  
**Subject:** RE: U&O FIP: Question on Statement in Draft FR Notice

Thanks Claudia and Greg.

I take care of the air analysis and the NEPA lead reviewer would be the primary reviewer in most cases for NHPA and cultural resources.

Greg, I'll shoot you a quick call.

Thanks again,

Chris

**From:** Smith, Claudia  
**Sent:** Tuesday, December 29, 2015 8:51 AM  
**To:** Nizich, Greg <Nizich.Greg@epa.gov>  
**Cc:** Razzazian, Christopher <Razzazian.Christopher@epa.gov>  
**Subject:** RE: U&O FIP: Question on Statement in Draft FR Notice

I'm going to defer to Chris Razzazian on the process details. He is the Air Program's NEPA liaison. I am under the impression that the NEPA group, in particular, Molly, for projects in the Uinta Basin, initially reviews any information and then reaches out to Chris for technical comments, but I'm not comfortable staking anything on it. If you can't get a hold of Chris, try Molly or Dana, whom you've already worked with.

**From:** Nizich, Greg  
**Sent:** Tuesday, December 29, 2015 8:44 AM

**To:** Smith, Claudia <[Smith.Claudia@epa.gov](mailto:Smith.Claudia@epa.gov)>  
**Subject:** RE: U&O FIP: Question on Statement in Draft FR Notice

Ah, I get it. Now that I understand FLM better it's OK to leave that statement alone (i.e., NEPA) since it is through that vehicle that NPS learns of this O&G activity.

On a slightly related question, when BLM first does the initial planning review at the basin level do you know who in Region 8 reviews the air impacts for that assessment? Is that Molly? Also, do you know who reviews the BLM's evaluation for potential impacts to cultural resources under NHPA? We got a comment from EarthJustice about those reviews so I need to do some more digging.

Thanks. Greg.

**From:** Smith, Claudia  
**Sent:** Tuesday, December 29, 2015 10:21 AM  
**To:** Nizich, Greg <[Nizich.Greg@epa.gov](mailto:Nizich.Greg@epa.gov)>  
**Subject:** RE: U&O FIP: Question on Statement in Draft FR Notice

That is what we were trying to convey, yes. The NPS becomes more fully aware of the potential impact of these projects through reviewing the required NEPA documents.  
Thanks for help clarifying.

**From:** Nizich, Greg  
**Sent:** Tuesday, December 29, 2015 6:17 AM  
**To:** Smith, Claudia <[Smith.Claudia@epa.gov](mailto:Smith.Claudia@epa.gov)>  
**Subject:** RE: U&O FIP: Question on Statement in Draft FR Notice

Ah, that helps somewhat, although now need clarification to what is meant by "... our intent to develop an enforceable solution to reduce emissions from existing sources in the context of ongoing evaluations under the National Environmental Policy Act for projects proposing the addition of thousands of additional oil and natural gas wells in the Uinta Basin"

Are the FLMs saying that they are aware of thousands of future sources based on their NEPA reviews and that they are glad to see we are planning to address existing sources? If so it seems like NEPA doesn't have to even be mentioned since it's my understanding from talking with Molly Vaughn that BLM has to approve new production leases anyway, even apart from NEPA (i.e., NEPA invokes certain requirements, but is not the mandate for lease approval). If that is true then I would just delete "under the NEPA" from above.

Thanks, Greg.

**From:** Smith, Claudia  
**Sent:** Monday, December 28, 2015 4:35 PM  
**To:** Nizich, Greg <[Nizich.Greg@epa.gov](mailto:Nizich.Greg@epa.gov)>  
**Subject:** RE: U&O FIP: Question on Statement in Draft FR Notice

Sorry, didn't give you any context. No, we wrote that statement summarizing comments made by stakeholders who attended our stakeholder meetings for our intent to propose a solution for the U&O Reservation to address the Uinta Basin ozone issues. We had separate meetings with Industry stakeholders, Environmental stakeholders, and FLMs (including NPS, who made that actual comment regarding concern for NOx, but support for enforceable solution to controlling existing sources).

I was thinking he was concerned with our mention of NEPA projects, but wasn't sure.

Thanks,

Claudia

**From:** Nizich, Greg  
**Sent:** Monday, December 28, 2015 2:01 PM

**To:** Smith, Claudia <[Smith.Claudia@epa.gov](mailto:Smith.Claudia@epa.gov)>  
**Subject:** RE: U&O FIP: Question on Statement in Draft FR Notice

Hi Claudia,

I assume he means that commenters on the oil and gas FIP? Did Chris write that statement? The Enviro group is EarthJustice (Docket ID EPA-HQ-OAR-2014-0606-0044). I am not familiar with the FLM one though, so I will have to look in the docket.

Thanks, Greg.

**From:** Smith, Claudia  
**Sent:** Monday, December 28, 2015 3:55 PM  
**To:** Nizich, Greg <[Nizich.Greg@epa.gov](mailto:Nizich.Greg@epa.gov)>  
**Subject:** U&O FIP: Question on Statement in Draft FR Notice  
**Importance:** High

Greg,

Chris Stoneman commented that we should check with you regarding the statement below, which is in the draft FR notice for the U&O FIP (found on page 36 of the Sharepoint version when editing in Word). Is there a cite needed? If so, what should it be? We are intending to transmit the draft documents to OAR for review sometime this week.

“Environmental group stakeholders expressed strong support for EPA action in the Uinta Basin and stressed the importance of regulating existing sources. Some of the Federal Land Managers expressed their concern with NOx emissions and the impacts on regional haze and acidification, but appreciated our intent to develop an enforceable solution to reduce emissions from existing sources in the context of ongoing evaluations under the National Environmental Policy Act for projects proposing the addition of thousands of additional oil and natural gas wells in the Uinta Basin.”

Thanks!

Claudia Young Smith

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<http://www2.epa.gov/caa-permitting/caa-permitting-epas-mountains-and-plains-region>

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